

**Air Pollution Control District  
Jefferson County, Ky  
6 October 2000**

**TITLE V PERMIT SUMMARY**

**Company:** Marathon Ashland Petroleum LLC, Algonquin Terminal

**Plant Location:** 1300 Southwestern Parkway, Louisville, KY 40211

**Date App. Received:** 7 June 1996

**Date Admin. Complete:** 6 August 1996

**Date of Draft Permit:** 23 April 2000

**Date of Proposed Permit:** 9 June 2000

**District Engineer:** John Bartles

**Permit No.:** 87-97-TV

**Plant ID:** 0741

**SIC Code:** 5171

**NAICS:** 42271

**AFS:** 00741

**Introduction:**

This permit will be issued pursuant to: (1) District Regulation 2.16, (2) Title 40 of the Code of Federal Regulations Part 70, and (3) Title V of the Clean Air Act Amendments of 1990. Its purpose is to identify and consolidate existing District and Federal air requirements applicable and to provide methods of determining continued compliance with these requirements.

Jefferson County is classified as of the date above as an attainment area for lead (Pb), sulfur dioxide (SO<sub>2</sub>), nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), particulate matter (PM), and particulate matter less than 10 microns (PM<sub>10</sub>); unclassifiable for particulate matter less than 2.5 microns (PM<sub>2.5</sub>); and is a moderate non-attainment area for ozone (O<sub>3</sub>).

**Application Type/Permit Activity:**

☒ Initial Issuance

☐ Permit Revision

☐ Administrative

☐ Minor

☐ Significant

☐ Permit Renewal

**Compliance Summary:**

☒ Compliance certification signed

☐ Compliance schedule included

☐ Source is out of compliance

**I. Source Description**

1. **Class I Area Impacts:** This source is not located in or near a Class I area.
2. **Product Description:** The source receives and dispenses, in bulk lots, various grades of gasoline, diesel fuel, and various grades of turbine fuel.
3. **Overall Process Description:** Shipments are transported to the terminal via barge, truck, or pipeline. Fuels received by each system are routed to the desired storage tank(s) through a fixed arrangement of pipes and valves. Fuels are withdrawn from the various tanks as desired and routed either to a loading rack, a transfer pipeline, or a pipeline which distributes turbine fuel to tanks located within the ramp area of the United Parcel Service Air Hub.
4. **Site Determination:** There are no other facilities which are contiguous or adjacent and under common control.
5. **Emission Unit Summary:**
  - a. **Fuel Storage U1 - U6:** The source stores fuels in internal floating, fixed or cone roof tanks of various sizes.
  - b. **Loadrack U7:** This is a six bay structure open on both ends for loading tank trucks with fuel and other volatile organic liquids. Bay number one is dedicated to dispensing gasoline only. Bays two through six are for loading all VOC materials. The area is constructed to drain spills and storm water from the area to an oil/water separator. Gaseous emissions from the load rack are vented to a Vapor Recovery Unit consisting of two packed carbon adsorption towers.
  - c. **Barge Loading U8:** Gasoline and other VOC materials are loaded into barges. Gaseous emission from the loading rack are vented to a Vapor Recovery Unit consisting of a combustion unit.
6. **Fugitive Sources:** The following activities identified in the Title V permit application have been determined by the District to be fugitive emission sources.

FUGITIVE EMISSION SOURCES	QUANTITY
Distillate load rack	1
Airport UPS pipeline	1
Used oil loadrack	1
Pumps, flanges and valves	Various
Oil / water separator	1

FUGITIVE EMISSION SOURCES	QUANTITY
Loadrack oil / water separator	1

**7. Title V Major Source Status by Pollutant:**

Pollutant	Actual Emissions (tpy) 1998 Data	Major Source Status (based on PTE)
CO	N/A	No
NO <sub>x</sub>	N/A	No
SO <sub>2</sub>	N/A	No
PM	0.13	No
VOC	41.57	Yes
Single HAP > 1 tpy	None	Yes
Total HAPs	2.895	Yes

**8. MACT Standards:**

40 CFR Part 60 Subpart XX	Standards of Performance for Bulk Gasoline Terminals
40 CFR Part 63 Subpart Y	National Emission Standards for Marine Vessel Tank Loading Operations

**9. Applicable Requirements:**

<input type="checkbox"/> PSD	<input checked="" type="checkbox"/> NSPS	<input checked="" type="checkbox"/> SIP	<input checked="" type="checkbox"/> MACT
<input type="checkbox"/> NSR	<input checked="" type="checkbox"/> NESHAPS	<input checked="" type="checkbox"/> District-Origin	<input type="checkbox"/> Other

**10. Referenced Federal Regulations in Permit:**

40 CFR Part 60 Subpart A	General Provisions
40 CFR Part 60 Subpart Ka	Standards of Performance for Storage Vessels For Petroleum Liquids (After May 18, 1978 and Prior to July 23, 1984)
40 CFR Part 60 Subpart Kb	Standards of Performance for Volatile Organic Liquid Storage Vessels (After July 23, 1984)
40 CFR Part 60 Subpart XX	Standards of Performance for Bulk Gasoline Terminals
40 CFR Part 63 Subpart A	General Provisions
40 CFR Part 63 Subpart Y	National Emission Standards for Marine Vessel Tank Loading Operations

\* 40 CFR Part 63 Subpart R

National Emission Standards for Gasoline  
Distribution Facilities

\* The source submitted the required documentation in the correspondence dated February 23, 1999, to demonstrate that this regulation did not apply.

## II. Regulatory Analysis

1. **Emission and Operating Caps:** Emission Unit 7 is limited to 80 mg/L at the carbon adsorption VRU outlet stack for the loading racks. Emission Unit U8 is limited to 18 mg/L at the vapor combustion unit outlet stack for the barge loading operation, and 504 million gallons per year of gasoline loaded, to avoid PSD requirements. (Marathon Ashland Petroleum LLC letter dated July 9, 1999)
2. **Compliance Status:** The source signed and submitted a Title V compliance certification in its permit application.
3. **Operational Flexibility:** The source did not request to operate under any alternative operating scenarios in its Title V permit application.
4. **Testing Requirements:** There are no testing requirements for this source once the initial performance test is completed on the barge loading vapor combustion unit, scheduled for May 25, 2000.
5. **Monitoring, Record Keeping and Reporting Requirements:** The source is required to monitor and maintain records of various operating parameters to demonstrate compliance with all applicable requirements. Vapor tightness certification seal checks, are maintained on an annual basis. Computer cross referencing identifies and denies loading of non certified trailers. Random visual, smell, and/or auditory leak checks of the vapor control system and couplings is conducted to insure compliance. Daily records are maintained on the vapor recovery system. Compliance reporting is required semi-annually, except where underlying applicable regulations or permit conditions require more frequent reporting.

### Periodic Monitoring:

- a. **Emission Units U1 - U6:** The equipment and operational standards specified in Regulations 6.13 and 7.12 are sufficient to demonstrate compliance, therefore, periodic monitoring for these emission units are not required.
- b. **Emission Unit U7:** The daily monitoring of the gasoline supply temperature and vacuum pressure of the bed during regeneration cycle is sufficient to demonstrate compliance with the volatile organic liquid (VOL) limit. A performance test was conducted on this unit on June 11, 1999, with a test result of 1.10 mg/L, which is well below the regulatory standard. The efficiency of the unit was estimated to be 98-99%. The daily checklist ensures that the vapor recovery unit is operating as designed and tested. To ensure

proper regeneration of the carbon beds, the maximum vacuum pulled during the regeneration cycle shall be greater than or equal to 26.5 inches of Hg. To ensure proper absorption by the absorption tower, the gasoline supply temperature shall not exceed 98 degrees F.

- c. **Emission Unit U8:** The monitoring requirements outlined in the MACT along with daily throughput records of the loading rack are sufficient to demonstrate compliance with the VOL limit.

**6. Off-Permit Documents:** None

The District considers an "off-permit document" as a document on which a source's compliance with any given regulation(s) is contingent upon or which contains regulatory requirement(s), but is only referenced in a source's Title V Operating Permit. The designation "off-permit document" shall be made at the District's discretion, and may include, but not be limited to, documents such as Regulation 1.05 VOC compliance plans, PMPs, MOCS, or other documents which are too voluminous to be included in a source's Title V Operating Permit, as determined by the District.

**III. Other Requirements**

1. **Temporary Facilities:** The source did not request to operate any temporary facilities.
2. **Short Term Activities:** The source did not report any short term activities.
3. **Compliance Schedule/Progress Reports:** The source has certified compliance with all applicable requirements; therefore, no schedule of compliance or progress reports are necessary.
4. **Emissions Trading:** None
5. **Acid Rain Requirements:** The source is not subject to the Acid Rain Program.
6. **Stratospheric Ozone Protection Requirements:** Title VI of the CAAA regulates ozone depleting substances and requires a phase-out of their use. This rule applies to any source that manufactures, sells, distributes, or otherwise use any of the listed chemicals. The source did not identify any listed chemicals in its Title V permit application.
7. **Prevention of Accidental Releases 112(r):** The source does not manufacture, process, use, store, or otherwise handle one or more of the regulated substances listed in 40 CFR Part 68 Subpart F and District Regulation 5.15, Chemical Accident Prevention Provisions, in a quantity in excess of the corresponding specified threshold amount.

- 8. Insignificant Activities:** The following activities identified in the Title V permit application have been determined by the District to be insignificant.

<b>Insignificant Activities</b>		
<b>Description</b>	<b>Basis</b>	<b>Quantity</b>
Gravel driveways	No regulation	various
Oil/water separators <200gal/day	Regulation 6.26, section 1	various
Truck compartmental flushing	No regulation	various
Barge hose drainage/drippage	No regulation	various
Sewer drains	No regulation	various
Non-halogenated solvent parts cleaners *	Regulation 2.02, section 2.3.22	various
Laboratory solvents & hoods	Regulation 2.02, section 2.3.11	various
Asphalt recycling	No regulation	various
Butane blending	No regulation	various
Pipeline relief sumps	Regulation 2.02, section 2.3.10	various
Distillate barge loading (vapor press. <1.5 psia)	40 CFR Part 63, section 63.560 (d) 1	1
Distillate load rack < 1.5 psia	Regulation 6.22, section 2.4	1
Airport UPS pipeline	No regulation	1
Used oil loadrack < 1.5 psia	Regulation 6.22, section 2.4	1
Diesel Fuel Storage Tanks, E4(Tank 97) and E5(Tank 98), vapor pressure less than 10 mmHg at 20°C and 760 mm of Hg	Regulation 2.02, section 2.3.9.2	2

- a. Insignificant Activities are only those activities or processes falling into the general categories defined in Regulation 2.02, Section 2, and not associated with a specific operation or process which there is a specific regulation. Equipment associated with a specific operation or process (Emission Unit) shall be listed with the specific process even though there may be no applicable requirements. Information contained in the permit and permit summary shall clearly indicate that those items identified with negligible emissions have no applicable requirements.
- b. Activities identified in Regulation 2.02, Section 2, may not require a permit and may be insignificant with regard to application disclosure requirements but may still have generally applicable requirements that continue to apply to the source and must be included in the Title V permit.

- \*i. Non-halogenated cold solvent parts cleaners shall be operated in compliance with all applicable sections of Regulations 6.18 and 7.18, including Section 4 of each.
- ii. No facility, having been designated as an insignificant activity, shall be exempt from any generally applicable requirements which shall include a 20% opacity limit for facilities not otherwise regulated.
- iii. No periodic monitoring shall be required for facilities designated as insignificant activities.

**Comment**

For emission points E4 (Tank 97) and E5 (Tank 98) the Federal regulations do not apply due to the equipment installation date.